

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court
Southern District of Texas
FILED

MAR 11 2014

United States of America

v. *Andres*Rodolfo GARZA
(YOB: 1990; USC)David J. Bradley, Clerk
Case No. *M-14-0476-M**Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 5, 2013 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:*Code Section*21 USC 841
21 USC 846*Offense Description*

defendant did, knowingly and intentionally possess with the intent to distribute approximately 21.2 kilograms of cocaine, a Schedule I controlled substance, and did knowingly and intentionally conspire to possess with intent to distribute with persons known and unknown approximately 21.2 kilograms of cocaine, a Schedule I controlled substance

This criminal complaint is based on these facts:

Before the United States Magistrate Judge, Southern District of Texas, I, Brian Chapa, Special Agent, United States Immigration and Customs Enforcement, being duly sworn, depose and say the following:

See Attachment A

☒ Continued on the attached sheet.

Approved to file

[Signature]

Grady Leopold, AUSA

[Signature]

Complainant's signature

Brian Chapa Special Agent HSI Falcon Dam, TX

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/11/2014*8:31 am**[Signature]*

Judge's signature

City and state: McAllen, Texas

Peter Ormsby, U.S. Magistrate Judge

Printed name and title

Attachment A

On December 5, 2013, the Starr County Sheriff's Office received a call from a concerned motorist regarding a reckless driver traveling west bound on Highway 83 entering Rio Grande City, Texas. Starr County Sheriff's Deputies responded to the area and observed a white Ford F250 bearing Texas License Plate 28KKN7, traveling at a high rate of speed. A vehicle stop was conducted on the vehicle at the intersection of Highway 83 and Reynaldo Gomez Street. The traffic stop resulted in the seizure of approximately 21.2 kilograms of cocaine and the arrest of Reynaldo Gonzalez.

The Starr County Sheriff's Office dispatched a call on the radio regarding a reckless driver traveling west bound on Highway 83 entering Rio Grande City, Texas. Dispatch stated the reckless vehicle was described as a white company work truck with an unreadable logo on the side of it. A Sheriff's Deputy was in the area of Santa Cruz and Highway 83 when he observed a white 2008 Ford F250 utility truck traveling west bound on Highway 83 near the Pueblo Tires in Rio Grande City. The Deputy got behind the F250 at which time the F250 began driving in the turning lane and passing several vehicles at a high rate of speed. The Sheriff's Deputy activated his emergency lights and conducted a vehicle stop on the F250 at the intersection of Highway 83 and Reynaldo Gomez St.

The driver of the F250 was identified as Reynaldo GONZALEZ and taken into custody for reckless driving and the F250 was seized by the Starr County SO. As the Deputy was transporting GONZALEZ to the County Jail, GONZALEZ stated to the Deputy there was three to five pounds of cocaine in the truck. The F250 was then taken to the Rio Grande City Port of Entry where the truck was x-rayed and an anomaly was seen in the toolbox. A further search of the F250 was conducted of the tool box where a man made compartment was found containing 19 bricks of a white powdery substance. The substance was field tested and tested positive for cocaine.

SA Chapa went to the Sheriff's Office and conducted an interview of GONZALEZ.

-GONZALEZ stated he was hired by a male named EDDY from Laredo, Texas to go to McAllen, Texas and pick up a truck containing narcotics and drive it back to Laredo.

-GONZALEZ stated he was taken to McAllen by a male named RUDY, in a gray Chevy Impala who was also hired by EDDY.

-GONZALEZ stated RUDY dropped him off at a restaurant in McAllen to pick up the truck with the narcotics and then he followed RUDY as they headed back to Laredo on Highway 83 and RUDY scouted for law enforcement.

SA Chapa assumed custody of GONZALEZ and placed him under arrest for possession of cocaine, 21 USC 841.

SA Chapa later found and interviewed RUDY, identified as Rodolfo GARZA, in Laredo.

-RUDY stated he was hired by EDDY to drive GONZALEZ to McAllen to pick up the F250 which he was told by EDDY was loaded with narcotics.

-RUDY stated he was not working at the time and EDDY said he would pay him \$100.00 for the trip and to scout for law enforcement on the way back to ensure the narcotics made it to Laredo.

-RUDY stated he needed the money and agreed to drive GONZALEZ to McAllen.